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Attorneys for Plaintiff OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OWEN DIAZ,
Plaintiff,
v.
TESLA, INC. dba TESLA MOTORS, INC.;
Defendant.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF LAWRENCE
ORGAN IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

Trial Date: March 27, 2023
Complaint filed: October 16, 2017

1 I, Lawrence Organ, hereby declare:


2 1. I am an attorney licensed to practice law in the State of California. I am the founding
3 attorney of the California Civil Rights Law Group, attorneys of record for Plaintiff Owen Diaz in
4 this action. I submit this declaration in support of Plaintiff's Administrative Motion to Consider
5 Whether Another Party's Material Should be Sealed. I have personal knowledge of the facts
6 stated herein and if called upon to testify, I could and would competently testify thereto, except
7 as to those matters that are stated upon information and belief.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of the protective order in the
9 California Superior Court, Alameda County matter *Marcus Vaughn, et al. v. Tesla, Inc.*,
10 ("*Vaughn*") case no. RG17882082 signed by the Hon. Winifred Y. Smith (Ret.) on July 1, 2020.

11 3. In *Vaughn*, Defendant Tesla, Inc. designated the documents at issue in the Plaintiff Diaz's
12 current briefing as CONFIDENTIAL under the Protective Order attached hereto.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct. Executed on August 18, 2023 in San Anselmo, California.

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16 DATED: August 18, 2023

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Lawrence A. Organ

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20 ALEXANDER MORRISON + FEHR LLP
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22 COLLIER LAW FIRM, LLP
23 Attorneys for Plaintiff OWEN DIAZ
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